



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

KTF  
F. #2015R01982

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 20, 2022

By ECF and E-mail

The Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Traffic Sports USA, Inc.,  
Criminal Docket No. 14-609 (PKC)

Dear Judge Chen:

The government respectfully submits this letter to request that the Court enter the enclosed order determining that the defendants Traffic Sports USA, Inc. and Traffic Sports International, Inc. owe no further restitution in connection with the above-referenced matter.

On or about August 23, 2021, representatives of the United States Department of Justice's Money Laundering and Asset Recovery Section ("MLARS") granted a joint petition (the "Petition") submitted by victims Fédération Internationale de Football Association ("FIFA"), Confederation of North, Central American and Caribbean Association Football ("CONCACAF") and certain constituent federations, and Confederación Sudamericana de Fútbol ("CONMEBOL," and with FIFA and CONCACAF, the "Victims") recognizing losses and remitting up to a total of more than \$201 million. Consistent with this determination by MLARS, the United States Marshals Service has remitted more than \$112 million in forfeited funds to the Victims. The amount of forfeited funds remitted to the Victims to date far surpasses the restitution amounts ordered by the Court in connection with sentencing proceedings in this case and related cases. For purposes of restitution proceedings before this Court, the Victims and their constituent member federations will have been made whole for all losses suffered in connection with the conduct in this case upon remission of the full amount approved pursuant to the Petition.

For the foregoing reasons, the government respectfully requests that the Court enter the enclosed order (1) determining that no restitution is owed by the defendants in connection with the above-referenced matter, and (2) entering no Amended Judgment.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
Kaitlin T. Farrell  
Assistant U.S. Attorney  
(718) 254-6072

Enclosure

cc: Clerk of the Court (PKC) (by E-mail)  
Counsel of Record (by ECF)